

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JENNIFER HILTY,)	
)	
Plaintiff,)	
)	
v.)	No. 2:20-cv-01804-RJC
)	
ALLSTAR THERAPIES, INC.,)	
)	
Defendant.)	

MOTION TO STAY

Comes now the Plaintiff, Jennifer Hilty, by and through her counsel, Susan N. Williams, Esq., and Williams Law Offices, and files the within Motion to Stay, in support thereof alleging as follows:

1. At the time that the charge of discrimination was filed with the EEOC on behalf of Jennifer Hilty, a charge was also filed on behalf of her coworker, Rachel Brown (now Ms. Hilty's wife).
2. Ms. Brown was terminated from her employment on October 16, 2019, following an unsuccessful mediation of both Ms. Brown and Ms. Hilty's claims with the EEOC.
3. A second charge of discrimination was filed alleging that Ms. Brown was terminated in retaliation for having filed the charge of discrimination with the EEOC.
4. A notice of dismissal has not yet been received on Ms. Brown's case.
5. From the standpoint of judicial economy, counsel for both Ms. Brown and Ms. Hilty (the undersigned) request that the case involving Ms. Hilty be stayed until such time as the complaint can be filed on behalf of Mrs. Brown case. The witnesses in each of the cases will be substantially the same, as will the factual situation.

6. Counsel for the defendant does not consent.

WHEREFORE, Plaintiff prays this Honorable Court to enter an order staying this case until such time as the Equal Employment Opportunity Commission has issued a Notice of Determination and Right to Sue in the case of Rachel Brown v. Allstar Therapies, Inc., and a Complaint has been filed on her behalf in the United States district Court for the Western District of Pennsylvania.

Respectfully submitted,

Susan N. Williams, Esq.

Susan N. Williams, Esq.

Williams Law Office

101 N. Main St., Suite 104-A

Greensburg, PA 15601

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Susan N. Williams, Esquire, of Williams Law Offices, hereby certify that a true and correct copy of the Plaintiff's Motion to Stay has been served on the following party of record via U.S. Western District's Electronic Case Filing System on this 25th day of February, 2021.

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Counsel for Defendant

Respectfully submitted,

s/Susan N. Williams, Esq.

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